

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

v.

DILBAR GUL DILBAR a/k/a DILBAR GUL TAJ  
ALI KHAN,

25-MJ-4055

Defendant.

---

**NOTICE OF MOTION AND MOTION FOR REVOCATION AND STAY OF  
MAGISTRATE JUDGE'S RELEASE ORDER**

THE UNITED STATES OF AMERICA, by and through its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, and Meghan K. McGuire, Assistant United States Attorney, respectfully moves, pursuant to Title 18, United State Code, Section 3145(a)(1), for an Order Magistrate Judge Colleen D. Holland's Order releasing the defendant; and

IN SUPPORT THEREOF, the government contends that, for reasons that will be supplemented in the government's forthcoming memorandum of law in support of its motion to revoke, the defendant's release would pose a serious flight risk; and

THE UNITED STATES OF AMERICA further moves for an Order staying the Magistrate Judge's Order releasing the defendant until such time as this Court can hear and determine the government's motion for revocation; and

IN SUPPORT THEREOF, the government hereby submits the accompanying memorandum of law. The defense has indicated that it plans to submit briefing on this issue as well.

WHEREFORE, it is respectfully requested that the Court:

- 1) Revoke Magistrate Judge Holland's May 13, 2025 Order releasing the defendant from custody and continue defendant's detention pending trial; and
- 2) Stay the Magistrate Judge's order releasing the defendant until such time as this Court can hear and determine this motion.

DATED: May 14, 2025

MICHAEL DiGIACOMO  
United States Attorney  
Western District of New York

By: *Meghan K. McGuire*  
Meghan K. McGuire  
Assistant U.S. Attorney  
United States Attorney's Office  
Western District of New York  
100 State Street, Suite 500  
Rochester, New York 14614  
(585) 399-3922  
Meghan.McGuire@usdoj.gov